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January 20, 2020

VIA CM/ECF

Honorable David G. Campbell
United States District Court
Sandra Day O'Connor U.S. Courthouse, Suite 522
401 West Washington Street, SPC 58
Phoenix, AZ 85003

RE: Bard IVC Filters Products Liability Litigation

Robert Pierro v. Bard Peripheral Vascular, Inc.
Docket No. 2:16-cv-02798

Your Honor,

My office would like to bring it to the Court's attention that our client Robert Pierro was not listed on any of the exhibits included with the Joint Status Report (Doc. 21406).

Prior to this filing of the Joint Status Report, my partner, David B. Rheingold, conferred with Bard's defense counsel Richard North and his paralegal Maria Turner on January 14, 2020. After corresponding over email, it was agreed to by Bard's defense counsel that our client would be moved from Exhibit I to Amended Exhibit B-F (Exhibit A). In addition, Plaintiff Leadership Counsel circulated the final draft of exhibits on January 16, 2020. On this draft, our client is correctly listed on Amended Exhibit B-F (Exhibit B).

We respectfully request that the Court allow an amendment be made to the Joint Status Report that would list Mr. Pierro on Amended Exhibit B. Thank you for your time.

Sincerely,

Sherri L. Plotkin

Sherri L. Plotkin, Esq.

SLP/gc

Cc: Richard North, Esq